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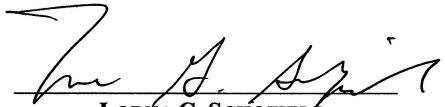
April 29, 2024

By Electronic Mail

Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

The initial pretrial conference scheduled for June 5, 2024, is rescheduled for **May 15, 2024, at 4:10 P.M.** Defendants shall file their premotion letter by **May 7, 2024**. Plaintiffs shall file their response by **May 10, 2024**. The parties' request to bifurcate discovery and the premotion letters will be addressed at the initial pretrial conference. The parties' request to stay discovery pending a decision on the request to bifurcate discovery and a decision on Defendants' motion to dismiss is **DENIED**. The parties are apprised that discovery typically is not stayed pending a motion to dismiss.

Dated: April 30, 2024
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Qwame Thomas v. Anschutz Entertainment Group, Inc., et al.,*
24-cv-1595

Dear Judge Schofield:

We represent Defendants Anschutz Entertainment Group, Inc. and The Bowery Presents, LLC in the above-captioned matter. We jointly write with Plaintiffs' counsel to respectfully request a stay of all discovery deadlines in the April 19, 2024 Civil Case Management Plan and Scheduling Order (Dkt. No. 17) until the Court decides the parties' request to bifurcate discovery and the Court's ruling on Defendants' motion to dismiss.

This case is a putative class action under the Fair Labor Standards Act and the New York Labor Law. The putative class consists of approximately 80 current and former employees. In connection with the proposed Civil Case Management Plan and Scheduling Order, the parties requested that the Court permit the parties to bifurcate discovery so that class certification discovery would first proceed, the parties would then have time to file and oppose class certification, and then once class certification is decided the parties would proceed with merits discovery. In response to this request, Your Honor issued an Order on April 19, 2024 (Dkt. No. 16) stating that the parties' request would be considered at the June 5, 2024 Initial Pretrial Conference.

Also, as stated in the proposed Civil Case Management Plan and Scheduling Order, Defendants stated they intended to file a motion to dismiss regarding Plaintiff's spread of hours claim. The Order also set a May 22, 2024 deadline for Defendants to file a pre-motion letter, to which Plaintiffs have until May 29, 2024 to respond.

The parties respectfully request that, in order to preserve the parties' time and resources, all discovery deadlines be stayed until the Court's decision on discovery bifurcation and the Court's ruling on Defendants' motion to dismiss because it will impact how the parties propound

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Honorable Lorna G. Schofield

- 2 -

April 29, 2024

discovery in the early stages of this matter. Similarly, given that Defendants' deadline to respond to the Complaint is May 12, 2024, prior to the pre-motion letter process is completed, the parties respectfully request that the deadline for Defendants' response to the Complaint be stayed until the Court's decision on any pre-motion letters.

Therefore, we respectfully request that all discovery deadlines that fall before June 5, 2024 in the Civil Case Management Plan and Scheduling Order be stayed until Your Honor issues a decision on the parties' request to bifurcate discovery and Defendants' motion to dismiss.

Respectfully submitted,

/s/ Michael DeLarco

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